

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PARKER PELHAM, Individually and on Behalf of )	
All Other Similarly Situated, )	
	)
Plaintiff, )	C.A. No. 23-162-JLH-SRF
	)
v. )	
	)
VBIT TECHNOLOGIES CORP., VBIT MINING )	
LLC, ADVANCED MINING GROUP, DANH )	
CONG VO a/k/a DON VO, PHUONG D VO a/k/a )	
KATIE VO, SEAN TU, JIN GAO, LILLIAN )	
ZHAO, and JOHN DOE INDIVIDUALS 1-10, and )	
DOE COMPANIES 1-10, )	
	)
Defendants. )	

**STIPULATION AND [PROPOSED] ORDER  
TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT**

WHEREAS, on July 29, 2024, Plaintiff Parker Pelham (“Pelham”) filed an Amended Complaint in this action (D.I. 34);

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, subject to the approval of the Court, that the time for Defendant, Phuong D Vo (“Katie Vo”) to move, answer, or otherwise respond to the Amended Complaint is extended through and including August 26, 2024.

*/s/ Brian S. Farnan*  
\_\_\_\_\_  
Brian E. Farnan (#4089)  
Michael J. Farnan (#5165)  
919 North Market St., 12<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 777-0300  
bfarnan@farnanlaw.com  
mfarnan@farnanlaw.com

*/s/ Travis S. Hunter*  
\_\_\_\_\_  
Travis S. Hunter (#5350)  
Jessica E. Blau (#7163)  
Richards, Layton & Finger, P.A.  
One Rodney Square  
920 North King Street  
Wilmington, DE 19801  
(302) 651-7700  
hunter@rlf.com  
blau@rlf.com

*Liaison Counsel for Plaintiff and the Class*

*Attorneys for Defendant Phuong D Vo a/k/a  
Katie Vo*

Dated: August 12, 2024

SO ORDERED, this \_\_\_\_\_ day of August, 2024.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE